

## REMARKS

The above Amendments and these Remarks are in reply to the Office Action mailed August 26, 2005 (the "Office Action"). Claims 1, 4, 8-10, 13 and 15-17 were pending in the Application prior to the outstanding Office Action. In the Office Action, claims 1, 4, 8-10, 13 and 15-17 were rejected under 35 U.S.C. §103(a).

### **I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)**

#### **A. Bacchi in view of Bonora**

On page 2 of the Office Action, the Examiner rejected claims 1, 4, 8-10 and 17 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,281,516 issued to Bacchi *et al.* ("*Bacchi*") in view of U.S. Patent No. 6,135,698 issued to Bonora *et al.* ("*Bonora*").

*Bacchi* discloses a load port 10 for receiving and opening more than one FOUP 18 at a time. The base of the load port 10 comprises a "a frame 12 to which two front or port plates 14 are attached." *Bacchi*, 4:16-17. As shown in Fig. 2 of *Bacchi*, the frame 12 comprises multiple pieces of material welded together. Each port plate 14, which is a flat piece of material, is bolted to the frame 12. "Each front plate 14 supports one of two substantially identical load box interface systems 16." *Bacchi*, 4:17-18. Each port plate 14 has an opening 74 to mate with the port door 76. *Bacchi*, 5:12-13. Fig. 12 illustrates that the port door 76 is lowered just far enough to not obstruct the port opening 74, at which point, the port door comes to rest behind the port plate 14 (shown as hidden line 352).

*Bonora* discloses two embodiments of a load port 100 for opening and closing SMIF pods. In one embodiment, the load port 100 lowers the SMIF pod door and cassette away from the SMIF pod shell, which remains stationary. In the other embodiment, the load port 100 raises the SMIF pod shell away from the SMIF pod door and cassette, which remains stationary.

#### **1. Independent Claim 1 is Patentably Distinguishable Over Bacchi In View of Bonora**

Claim 1 recites, among other things, an apparatus having:

"a frame including:

a first elongated structural member and a second elongated structural member, said first and second elongated structural members each having a front face, a rear face, a top portion and a bottom portion;

a structure secured to said bottom portion of ~~both~~ of said first and second elongated structural members, said structure having an exterior surface partially covering said front face of said first and second elongated structural members, an interior surface partially covering said rear face of said first and second elongated structural members;

a port door storage area located between said first and second elongated structural members, said exterior surface and said interior surface;"

In the Office Action, the examiner points to the two vertical supports in the frame 12 in *Bacchi* as two "elongated structural members" (not numbered in Fig. 2 of *Bacchi*). The frame 12 in *Bacchi*, however, does not include a "structure" that partially covers the front and rear surfaces of the "elongated structural members" to provide a "port door storage area." *Bacchi* also does not suggest that the frame 12 could have such a "structure" for several reasons. First, Fig. 2 of *Bacchi* illustrates that the frame 12 is constructed of solid bars. The bottom horizontal bar of the frame 12 cannot accommodate a port door, and this horizontal bar of the frame 12 cannot be adapted to do so. Fig. 2 of *Bacchi* also illustrates that each port plate 14 mounts directly to the front of each vertical support of the frame 12. If the bottom horizontal bar of the frame 12 partially covered the front face of the vertical support, the port plate 14 would mount to an uneven surface.

The load port opener 100 disclosed in *Bonora* does not teach or suggest the elements missing in *Bacchi*. The load port opener 100 in *Bonora* comprises the "container advance assembly" recited in claim 1. None of the other features recited in claim 1 are taught or suggested by *Bonora*. For example, *Bonora* does not teach or suggest a "port door storage area" or an "isolation plate." Therefore, the apparatus recited in claim 1 is not obvious over *Bacchi* in view of *Bonora*.

2. **Dependent Claims 4 and 23-27 are Patently Distinguishable Over Bacchi In View of Bonora**

Dependent claims 4 and 23-27 depend directly or indirectly from independent claim 1. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 4 and 23-27 are allowable for at least the reasons set forth above concerning independent claim 1.

3. **Independent Claim 8 is Patently Distinguishable Over Bacchi In View of Bonora**

Claim 8, among other things, recites:

“a frame including:

a first elongated structural member and a second elongated structural member, said first and second elongated structural members each having a first end and a second end; and

a support mounted to said second ends of said first and second elongated structural members;

a port door storage area;

.....

an isolation plate detachably secured to said first and second elongated structural members, said isolation plate having an opening located at an elevation between said first and second ends of said first and second elongated structural members;”

The load port 10 disclosed in *Bacchi* does not include such an “isolation plate.” Fig. 2 of *Bacchi* clearly illustrates that the opening 74 in each port plate 14 is located at an elevation higher above the entire frame 12. *Bacchi* does not teach or suggest that the opening 74 in the port plate 14 can be lowered to an elevation between the top and bottom ends of the vertical supports in the frame 12. In fact, *Bacchi* teaches away from doing just that. The linear traveling robot assembly 400 mounts directly to the back of each port plate 14. If the opening 74 was lowered to an elevation between the top and bottom ends of the vertical supports of the frame 12, the wafer robot 20 would not be able to access wafers through the opening 74. The opening 74 would be

blocked by the assembly 400. As discussed above regarding claim 1, *Bacchi* also does not teach or suggest a “frame” having a “port door storage area.”

For at least the same reasons discussed above regarding claim 1, *Bonora* does not teach or suggest the elements missing in *Bacchi*. Therefore, the apparatus recited in claim 8 is not obvious over *Bacchi* in view of *Bonora*.

**4. Dependent Claims 9-10 are Patentably Distinguishable Over Bacchi In View of Bonora**

Dependent claims 9-10 depend directly or indirectly from independent claim 8. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 9-10 are allowable for at least the reasons set forth above concerning independent claim 8.

**B. Bacchi In View Of Babbs**

On page 4 of the Office Action, the Examiner rejected claims 13 and 15-17 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,281,516 issued to *Bacchi et al.* (“*Bacchi*”) in view of U.S. Patent No. 6,570,727 issued to *Babbs et al.* (“*Babbs*”). Applicants have canceled claims 13 and 15-17.

**Additional Remarks**

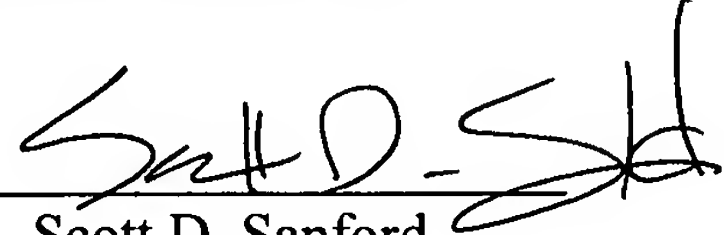
In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested. Applicants respectfully assert that new claims 18-36 are also in condition for allowance. For example, the combination of *Bacchi* and *Bonora* does not teach or suggest an “isolation plate having an opening located at an elevation located between said upper support and said lower support [of the frame]” – as recited in claim 18. As discussed above regarding claim 1, the opening 74 in each port plate 14 in *Bacchi* is located entirely above the frame 12 and cannot be lowered to such an elevation.

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-3548 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: November 22, 2005

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